

ORIGINAL
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

OCT 17 2003
LUT
By Blocker

IN RE: TRI-STATE
CREMATORIAL LITIGATION : MDL DOCKET NO. 1467
:
This relates to all actions.

R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S,
SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS,
INC.'S, ERWIN-PETITT FUNERAL HOME, INC.'S,
RYAN FUNERAL HOME INC.'S, R. D. MOORE FUNERAL HOME INC.'S,
TAYLOR FUNERAL HOME OF CHATTANOOGA, INCORPORATED'S,
AND THOMAS & SON FUNERAL HOME, INC.'S,
REQUEST TO FILE ORIGINAL DISCOVERY

COME NOW R. DUDLEY BARTON & SON FUNERAL HOME, INC.,
SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS, INC.,
ERWIN-PETITT FUNERAL HOME, INC.'S, RYAN FUNERAL HOME INC., R. D.
MOORE FUNERAL HOME, INC., TAYLOR FUNERAL HOME OF
CHATTANOOGA, INCORPORATED, and THOMAS & SON FUNERAL HOME,
INC., Defendants in the above-styled civil action, and pursuant to Fed. R. Civ. P. 56.
request that the Plaintiffs file the following original discovery:

1. Deloris Headrick's Responses to Defendants' First Master Set of
Interrogatories and Request for Production of Documents;
2. Original Deposition of Robert A. Ryan, Jr.;

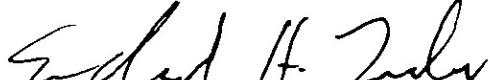
3. Original Deposition of John Taylor;
4. Original Deposition of James C. Eggert;
5. Original Deposition of Robert Dudley Barton, IV;
6. Original Deposition of Durward Petitt; and
7. Original Deposition of Larry Moore.

Respectfully submitted this 15 day of October, 2003.

Respectfully Submitted,

GOODMAN, MCGUFFEY, LINDSEY &
JOHNSON, LLP

By:



EDWARD H. LINDSEY, JR.
Georgia State Bar No. 453075

By:

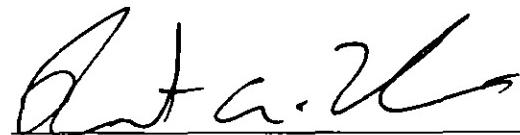


T. JEFFERY LEHMAN
Georgia State Bar No. 445725

(Signatures Continued on Next Page)

Goodman McGuffey
Lindsey & Johnson, LLP
2100 Tower Place
3340 Peachtree Road, NE
Atlanta, Georgia 30326-1084
(404) 264-1500
(404) 264-1737 FAX

By:



ROBERT A. LUSKIN

Georgia State Bar No. 004383

Attorneys for Defendants R. Dudley Barton & Son Funeral Home, Inc., Sequatchie Valley Memorial Funeral Home and Gardens, Inc., Ryan Funeral Home Inc., R. D. Moore Funeral Home, Inc., Taylor Funeral Home of Chattanooga, Incorporated, and Thomas & Son Funeral Home, Inc.

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Lindsey & Johnson, LLP
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
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CERTIFICATE OF FONT AND POINT SIZE

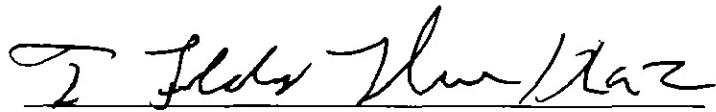
The font and point style used in this **R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S REQUEST TO FILE ORIGINAL DISCOVERY** is Times New Roman 14 Point.

This 15 day of October, 2003.

Respectfully Submitted,

GOODMAN, McGUFFEY, LINDSEY
& JOHNSON, LLP


EDWARD H. LINDSEY, JR.
Georgia State Bar No. 453075


T. JEFFERY LEHMAN
Georgia State Bar No. 445725

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Atlanta, Georgia 30326-1084
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(404) 264-1737 FAX



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Georgia State Bar No. 004383

Attorneys for Defendants R. Dudley Barton & Son Funeral Home, Inc., Sequatchie Valley Memorial Funeral Home and Gardens, Inc., Ryan Funeral Home Inc., R. D. Moore Funeral Home, Inc., Taylor Funeral Home of Chattanooga, Incorporated, and Thomas & Son Funeral Home, Inc.

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CERTIFICATE OF SERVICE

This is to certify that I have this date served upon counsel in the above captioned lawsuit a copy of the foregoing **R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S, SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS, INC.'S, ERWIN-PETITT FUNERAL HOME, INC.'S, RYAN FUNERAL HOME INC.'S, R. D. MOORE FUNERAL HOME INC.'S, TAYLOR FUNERAL HOME OF CHATTANOOGA, INCORPORATED'S, AND THOMAS & SON FUNERAL HOME, INC.'S, REQUEST TO FILE ORIGINAL DISCOVERY** by depositing same in the United States Mail with proper postage affixed thereon and addressed to:

Robert H. Smalley, III, Esq.
McCamy, Phillips, Tuggle &
Fordham, LLP
P.O. Box 1105
Dalton, GA 30720

McCracken K. Poston, Jr., Esq.
Office of McCracken Poston
PO Box 1130
Ringgold, GA 30736

J. Anderson Davis, Esq.
Brinson, Askew, Berry, Seigler,
Richardson & Davis, LLP
The Omberg House
615 West First Street
P.O. Box 5513
Rome, GA 30162-5513

This 15 day of October, 2003.

By:



EDWARD H. LINDSEY, JR.

Georgia State Bar No. 453075

Attorneys for Defendants R. Dudley Barton & Son Funeral Home, Inc., Sequatchie Valley Memorial Funeral Home and Gardens, Inc., Ryan Funeral Home Inc., R. D. Moore Funeral Home, Inc., Taylor Funeral Home of Chattanooga, Incorporated, and Thomas & Son Funeral Home, Inc.

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